

Message

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**From:** Frank Juel Nielsen [FJN@morsoe.com]  
**Sent:** 5/11/2021 9:10:50 AM  
**To:** WoodHeaterReports [WoodHeaterReports@epa.gov]; Sanchez, Rafael [Sanchez.Rafael@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]  
**CC:** Danick Power [dpower@polytests.com]; Sebastian Button [sebastian.button@pfsteco.com]  
**Subject:** Status on pending certification application.  
**Attachments:** ATT00001.txt

Mr.Sanchez,

**Regarding status on pending EPA certification application**

Is it possible to get a status on our certification application for the 5660 wood stove inserts?  
We initiated our application 8 months ago. We addressed deficiencies 2 months ago.

Not knowing status makes it difficult to plan, both production and further product development.

If you are able to say any news about certification status it will be appreciated.

Thank you.

Med venlig hilsen / Best regards



Frank Juel Nielsen

Udviklingsingeniør/R & D Engineer

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**Fra:** Danick Power <dpower@polytests.com>

**Sendt:** 15. marts 2021 21:08

**Til:** WoodHeaterReports <WoodHeaterReports@epa.gov>; Frank Juel Nielsen <FJN@morsoe.com>; Yellin, Patrick <Yellin.Patrick@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>

**Cc:** Sebastian Button <sebastian.button@pfsteco.com>; Scinta, Robert <scinta.robert@epa.gov>; Sanchez, Rafael <Sanchez.Rafael@epa.gov>

**Emne:** New Certification Wood Heater Test Report Requested Information."

M. Sanchez,

Please find below a link to download updated reports CBI & NCBI ( Morsø 5660 B and 5660 B Standard model). Also below all deficiencies addressed.

# Ex. 4 CBI

Best regards,

**Danick Power P. Eng.**  
Vice-President Operations

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**De :** WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>

**Envoyé :** 11 mars 2021 11:07

**À :** Frank Juel Nielsen <[FJN@morsoe.com](mailto:FJN@morsoe.com)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Johnson, Steffan <[johnson.steffan@epa.gov](mailto:johnson.steffan@epa.gov)>

**Cc :** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>; Sebastian Button <[sebastian.button@pfsteco.com](mailto:sebastian.button@pfsteco.com)>; Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>

**Objet :** RE: Status on pending EPA certification application, Request for test report corrections

**Importance :** Haute

Mr. Nielsen,

Thank you for your email regarding the Morsø 5660 B and 5660 B Standard model. We have conducted a review of the submitted test report and found the certification test deficient. Below is a table describing the irregularities found:

Appliance Model	Morsø 5660 B and 5660 B Standard
Appliance Type	Wood Heater Insert
Fuel Type	Cordwood
Test Lab	Polytests
Date of Compliance Test	8/3/2020 to 8/4/2020
Test Report ID	Project: PI-20205
Findings (highlight one):	Acceptable  Deficient  Invalid - Retest
Findings Reasoning:	See notes below.

List of Irregularities Found	
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Issue	Applicable Method/Rule Section	Actions Needed	How the manuf/test lab address irregularity?
1. Page 11 has firebox dimensions, but they do not equate to 1.15 cubic ft.	<b>40 CFR 60.533(b)(3) and (b)(5)</b>	<p>Please provide appropriate dimensions and calculations for the firebox in the non-CBI report.</p> <p>Additionally, the "EPA volume reduction letter" provided with the package asks for the following:  "Keep in mind to include all data on calculating the firebox volume in the emission report and most important to include this in your operating manual and to include detail operating instructions of not loading wood above the back stone wall blocking the air flow for proper combustion."</p> <p>This was not found in the test report and the suggestions of operating instructions in the owner's manual.</p>	<p>Added drawing of Firebox Volume (drawing no.5600-510) and Excel sheet with picture</p> <p>Manual updated with more details on operating the stove. Chapter 2.2</p>
2. Clarify the primary air setting for the unit conditioning (page 87 of non-CBI TR).	<b>ASTM 3053 (8.1.4) (8.1.5) (8.1.6) (8.1.7)</b>	Please include the primary air setting for unit conditioning in the TR.	After establishing the fire on high primary air controller setting at start-up and when reloading (few minutes), the primary air controller was set midrange to achieve a medium burn. Report p11
3. Discussion on anomalies (even if none), validity and appropriateness.	<b>40 CFR 60.533(b)(5)</b>	Please include this discussion in section 3.4 of the test report.	Section 3.4 p13 of the revision1 report
4. Appendix 3 is calibration data which needs to be included in the non-CBI report.	<b>40 CFR 60.533(b)(5) and 60.535(a)(2)(iii)</b>	Please include Appendix 3 calibrations in the non-CBI report.	Updated in NCBI report
5. Appendix 13 which is the operating instructions sent to the lab need to be	<b>40 CFR 60.534(h) and 40 CFR 60.536(g)(1)</b>	Please include Appendix 13 operating instructions in the non-CBI report.	Updated in NCBI report

included in the non-CBI report.			
6. Photos (page 168-170) not all inclusive to what is stated in the method.	<b>ASTM 3053 (8.5.9.2), (8.5.9.3), (8.5.9.5), (8.6.9.1)</b>	Please provide additional photos of the fuel loaded in the unit or provide captions of blackboard writings.	Updated Appendix 9 photograph, with additional photos and comments. CBI & NCBI report
7. Owner's manual needs a section with proper use of air controls and proper low fire operation.	<b>40 CFR 60.536 (g)(3)(iii)</b> Proper use of air controls, including how to establish good combustion and how to ensure good combustion at the lowest burn rate for which the heater is warranted.	Please modify the text to give more description for home use instructions on operating the air controls and proper low burn.	Added on chapter 2.2
8. The owner's manual needs an improper fuel warning.	<b>40 CFR 60.536(g)(3)(i)</b> Fuel loading and re-loading procedures; recommendations on fuel selection and warnings on what fuels not to use, such as unseasoned wood, treated wood, colored paper, cardboard, solvents, trash and garbage;	Please add a statement in the owner's manual about improper fuel use.	Added on chapter 2.1
9. Page 11 of the TR states the following: "A few screening tests have been done to ensure the repeatability of the results."	<b>40 CFR 60.534(a)(1) and 40 CFR 60.533(b)(5)</b>	Please provide an explanation concerning this statement.  Also need the appropriate data for these screening tests to be included in the TR (Could not find any in the report.)	Removed from the revised report, those where only burns with visual aspect checks, no data was taken during burns.

We request that Morso submit both a revised CBI test report and a revised non-CBI test report to the EPA within ten (10) business days from receipt of this email to continue with the above-referenced model's certification review. The revised test reports (both CBI and non-CBI) should clearly identify the report as revised, provide a revision date, and include a summary table indicating what revisions have been made and where in the report the revisions are located. In addition, a revised certificate of conformity must be submitted. The CoC must indicate the CoC's revision dates, which must be in concert with the revision dates of the test report. Finally, the CoC must include a description of the revisions that the Certifier evaluated for certification and compliance with the Wood Heater NSPS. Please submit the revised CBI and non-CBI test reports to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov). The subject line of your email should be marked as "**New Certification Wood Heater Test Report Requested Information.**" If you have any questions, please let me know.

**Rafael Sanchez, Ph.D.**

**Wood Heater Program Lead**  
**Air Branch**  
**Monitoring, Assistance, and Media Programs Division**  
**Office of Compliance**  
**U.S. Environmental Protection Agency (EPA)**  
**Room 7149-D**  
**1200 Pennsylvania Ave., NW**  
**MS:2227A**  
**Washington, DC 20460**  
**202-564-7028**  
**202-564-0050 fax**  
**Teleworking on Mondays, Wednesdays, and Fridays (571-236-1927)**

**Questions about Wood Heaters or Certifications? Send them to**  
**[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)**

Are you looking for a wood heater or central heater? Please try our fully searchable [EPA Certified Wood Heater Database](https://www.epa.gov/compliance/epa-certified-wood-heater-database) (<https://www.epa.gov/compliance/epa-certified-wood-heater-database>).

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**From:** Frank Juel Nielsen <[FJN@morsoe.com](mailto:FJN@morsoe.com)>  
**Sent:** Thursday, March 11, 2021 3:40 AM  
**To:** Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Johnson, Steffan <[johnson.steffan@epa.gov](mailto:johnson.steffan@epa.gov)>  
**Cc:** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>; Sebastian Button <[sebastian.button@pfsteco.com](mailto:sebastian.button@pfsteco.com)>  
**Subject:** Status on pending EPA certification application

For whom it may concern.

**Regarding status on pending EPA certification application**

Is it possible to get a status on our certification application for the 5660 wood stove inserts? It has been over 6 months since we send in the application. We used to get information/status within 3 months on previous applications.

Thank you.

Med venlig hilsen / Best regards



Frank Juel Nielsen

Udviklingsingeniør/R & D Engineer

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**Fra:** Frank Juel Nielsen

**Sendt:** 18. februar 2021 12:51

**Til:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>

**Emne:** SV: report package for review Morso AND ADEC deficient/disapproved appliances

Mr. Sanchez,

Is it possible to get a status on our certification application for the 5660 wood stove inserts?

To inform you, we tried to reach out to the Alaska DEC regarding their issues.

Starting with one (ASTM 3053) approved stove. Followed up on the issues that needed addressing on the manufacturers side. Still issues that needed be addressed on the test lab side and 3 party certifier sides. The Alaska DEC never turned back.

Since it is a complex task to address issues that involve 3-4 parties, we will let it rest for now and return when we have more surplus to deal with it.

However, all this has come as a bad surprise since we have always used test-labs and 3-party certifiers, that are EPA approved /accredited on regularly basis regarding test methods and procedures.

Thank you

Med venlig hilsen / Best regards



Frank Juel Nielsen

Udviklingsingeniør/R & D Engineer

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**Fra:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>

**Sendt:** 8. december 2020 15:47

**Til:** Frank Juel Nielsen <[FJN@morsoe.com](mailto:FJN@morsoe.com)>

**Cc:** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>

**Emne:** RE: report package for review Morso AND ADEC deficient/disapproved appliances

**Prioritet:** Høj

Mr. Nielsen,

Thank you for your email. We are thoroughly reviewing each test report and supporting documentation submitted to the Agency for potential certification. With that in mind, the review of your certification application may take longer than the anticipated 90 days. We appreciate your patience and understanding.

Incidentally, I would like to bring your attention to several test reports that the Alaska DEC recently reviewed for their nonattainment implementation program and found those reports deficient or disapproved. According to ADEC, those appliances cannot be installed in the Alaska Fairbanks North Star Borough (see below info). Please check the list below and consider asking the test lab to revise them. Once you revise them, please submit a copy to the EPA and ADEC and post them on your website. The full list containing all affected manufacturers can be found at <https://dec.alaska.gov/air/burnwise/manufacturers-vendors/>.

<u>46</u>	Morso	6140 B, 6143 B, 6148 B, and 6170 B	ASTM E3053	Requires a more thorough review	Pending - Major	IR, NR
<u>59</u>	Morso Jernstoberi A/S	1410B, 1440B, and 1450B	EPA M28R	Requires a more thorough review	Pending - Major	MD, IDU, IR, NR
<u>128</u>	Morso Jernstoberi A/S	2B Standard 2020	ASTM E3053		Pending - Major	IR
<u>60</u>	Morso Jernstoberi A/S	3112B/3142B	EPA M28R	Requires a more thorough review	Disapproved	ES1, IDU, IR
<u>61</u>	Morso Jernstoberi A/S	7110b	ASTM E3053	Requires a more thorough review	Pending - Major	IR, NR

#### Why is Alaska reviewing certification reports?

Alaska is reviewing the certification test reports for those US EPA appliance certified as complying to the Step 2 standards per 40 CFR part 60 Subpart AAA or Subpart QQQQ and as reported on the EPA Wood Heater Database that are or wish to be on the Approved Device List to ensure compliance with the ADEC standards and requirements in accordance with 18 AAC 50.077. This effort to review certification reports is to ensure that wood burning may continue in the Fairbanks North Star Borough nonattainment area now and into the future. In order to continue improving the air quality, reach attainment and continue to allow burning from a range of devices, ADEC needs assurances that the devices that are allowed to be installed within the area were tested in accordance with all requirements detailed in the US EPA regulations without anomalies, deviations, or defects. A single certification test is relied upon to demonstrate compliance for potentially hundreds of appliances within a PM2.5 Serious nonattainment area, an area where residential wood burning has been determined to be the largest contributing source sector; therefore, certification test reports must be held to the highest standard in order to guarantee claimed emission rates in all installations of a certified make and model. In addition, the New Source Performance Standards (NSPS) Subparts AAA and QQQQ require a recertification every 5 years; however, a recertification with a new test is not guaranteed. It is possible, then, that a device could pass a single certification test, and meet NSPS Subpart AAA or QQQQ requirements for years if not decades. With the new federal regulations specified in NSPS Subpart AAA and QQQQ, all certification testing has been completed within the last five years. Completing a full report review is important to ensure that the goals for the program and community are met now and into the future.

If you have any questions, please let me know.

Rafael Sanchez, EPA

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**From:** Frank Juel Nielsen <[FJN@morsoe.com](mailto:FJN@morsoe.com)>  
**Sent:** Monday, December 7, 2020 2:11 AM  
**To:** WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Cc:** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>  
**Subject:** SV: report package for review Morso

Mr. Sanchez,

Any news on the Morso 5660 B series wood stove insert application? Let me know if you need more information or documents.

Thank You

Frank

Med venlig hilsen / Best regards



Frank Juel Nielsen

Udviklingsingeniør/R & D Engineer

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---

**Fra:** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>  
**Sendt:** 8. september 2020 22:16  
**Til:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Cc:** Frank Juel Nielsen <[FJN@morsoe.com](mailto:FJN@morsoe.com)>  
**Emne:** RE: report package for review Morso

Rafael,

I re-submit you the file few minutes ago

Best regards,

**Danick Power P. Eng.**



Vice-President Operations

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**De :** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Envoyé :** 8 septembre 2020 15:50  
**À :** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>  
**Cc :** 'Frank Juel Nielsen ([fjn@morsoe.com](mailto:fjn@morsoe.com))' <[fjn@morsoe.com](mailto:fjn@morsoe.com)>  
**Objet :** RE: report package for review Morso

Danick, Please resubmit link again.

---

**From:** Danick Power <[dpower@polytests.com](mailto:dpower@polytests.com)>  
**Sent:** Monday, August 31, 2020 4:15 PM  
**To:** WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>  
**Cc:** 'Frank Juel Nielsen ([fjn@morsoe.com](mailto:fjn@morsoe.com))' <[fjn@morsoe.com](mailto:fjn@morsoe.com)>  
**Subject:** report package for review Morso

Rafael,

I sent you a wetransfer link to download a emission report package for review. If you have any question you can reach me or contact directly Frank juel Nielsen at Morso

Thank you  
Best regards,

**Danick Power P. Eng.**  
Vice-President Operations

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